

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 85-64

WASTE DISCHARGE REQUIREMENTS
(SITE CLEANUP REQUIREMENTS) FOR

MEMOREX CORPORATION
MEMOREX DRIVE FACILITY
CITY OF SANTA CLARA
SANTA CLARA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region, (hereinafter Board) finds that:

1. Memorex Corporation, hereinafter called the discharger, owns a computer tape manufacturing facility on a 10.3 acre site in the City of Santa Clara, Santa Clara County located at 1200 Memorex Drive, which is approximately three (3) miles west of the intersections of Routes 17 and 101.
2. The discharger operates a solvent storage and distribution system which includes a number of underground tanks used presently or in the past to store the following chemical compounds: methyl ethyl ketone, xylenes, cyclohexanone, isopropanol, acetone and diesel fuel.
3. Subsurface investigation has detected organic solvents, including methyl ethyl ketone, xylenes, and cyclohexanone, in both soils and groundwaters in the vicinity of the tank farm. This contamination appears to be the result of spillage, inadequate chemical handling practices, overflows, or possible leakage from tanks or piping.
4. As of May 1985 solvent contamination extended vertically to a gravelly sand aquifer at a depth of about 29 feet and horizontally to a distance about 300 feet downgradient of the tank farm.
5. A potentially usable aquifer exists at a depth of about 75 feet. This aquifer is separated from the contaminated aquifer by about 45 feet of silty clay. Currently used groundwater in the area is reported to be drawn from a depth of 150 feet greater.
6. The discharger has proposed to implement the following remedial action plan:

- a. Contain and clean up the polluted groundwaters by pumping well No. M-11 as an extraction well. The extracted groundwater will be treated by a carbon adsorption unit, or alternative treatment system capable of achieving equivalent pollutant reduction, followed by discharge to the storm drain tributary to the Gaudalupe River. The discharge will be regulated by a National Pollutant Discharge Elimination System (NPDES) Permit adopted by the Board.
 - b. Continue to monitor the localized groundwater pollution, and document contaminant concentration changes over time by collection and analysis of water samples from the site monitoring wells.
 - c. Test the underground tanks with a precision test to ensure their integrity, and where necessary, renovate or replace the existing solvent storage and distribution system.
7. The Board finds that the tasks outlined in Finding 6 above are necessary to prevent the continued migration of contaminants to unaffected groundwaters in a manner which could result in the loss of potential beneficial uses.
 8. The Board adopted a revised Water Quality Control Plan (Basin Plan) for the San Francisco Bay Region on July 21, 1982. The Basin Plan contains water quality objectives for South San Francisco Bay and the Guadalupe River. The Basin Plan also contains water quality objectives for groundwater.
 9. The beneficial uses of South San Francisco Bay and the Guadalupe River include:
 - a) Contact and non-contact water recreation
 - b) Wildlife Habitat
 - c) Preservation of Rare & Endangered Species
 - d) Estuarine Habitat
 - e) Warm fresh water and cold fresh water habitat
 - f) Fish spawning and migration
 - g) Industrial Service Supply
 - h) Shellfish
 - i) Navigation
 - j) Open Commercial and Sport Fishing

10. The existing and potential beneficial uses of the groundwater underlying the facility include:
 - a. Industrial process water supply
 - b. Industrial service supply
 - c. Domestic supply
 - d. Agricultural supply
11. The Board has notified the discharger and interested agencies and persons of its intent to prescribe waste discharge requirements for the proposed discharge and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.
12. This project constitutes a minor modification to land and such activity is thereby exempt from the provisions of the California Environmental Quality Act (CEQA) in accordance with Section 15304 of the Resources Agency Guidelines.
13. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED, that Memorex Corporation, Santa Clara, in order to meet the provisions contained in Division 7 of the California Water Code and the regulations adopted thereunder, shall comply with the following:

A. Prohibitions

1. The discharge of waste or hazardous materials in a manner which will degrade the water quality so as to result in the loss of beneficial uses of the groundwaters of the State is prohibited.
2. Further migration of groundwater pollutants to usable groundwater is prohibited.

B. Specifications

1. The treatment or disposal of waste shall not create a nuisance as defined in Section 13050(m) of the California Water Code.
2. Testing, usage, and renovation or replacement of the solvent storage distribution system shall be in accordance with state laws and the city or county ordinances which regulate the underground storage of hazardous materials.

C. Provisions

1. The discharger shall submit to the Board technical reports on self-monitoring work performed according to a program approved by the Executive Officer.
2. In order to comply with Prohibitions A.1 and A.2, the discharger shall accomplish the following:
 - a. The discharger shall submit a report to the Board due July 1, 1985 which demonstrates the adequacy of the extraction well to contain the contaminant plume. The report will include an analysis and evaluation of the extraction/treatment system, and the capture zone of the extraction well, with recommendations for an effective pumping strategy, or the need for additional wells or other measures necessary to ensure containment of the plume and efficient removal of volatile organic compounds from groundwaters.
 - b. Submit to the Regional Board by October 7, 1985, a status report on the testing and the current operation of the solvent storage and distribution system, and the recommendation and plans for renovation or replacement of this system.
3. All samples shall be analyzed by laboratories using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control records for Board review.
4. The discharger shall permit the Board or its authorized representative, in accordance with Section 13267(c) of the California Water Code:
 - a. Entry upon premises where any pollution source exists, or may potentially exist, or in which any required records are kept;
 - b. Access at reasonable times to copy any records required to be kept under terms and conditions of this Order;
 - c. Inspection of any monitoring equipment or methods required by this Order.
 - d. Sampling of any groundwater or soil which is accessible, or may become accessible as part of any investigation or remedial action program, to the discharger.

5. The discharger shall file a report on any material changes in the nature quantity or transport of polluted groundwater associated with the pollution described in this Order.
6. The discharger shall maintain in good working order and operate, as efficiently as possible any facility or control system installed to achieve compliance with the requirements of this Order.
7. The Board will review this Order periodically and may revise the requirements when necessary.

I, Roger B. James, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region on May 15, 1985.

ROGER B. JAMES
Executive Officer

Attachments:

- A. Site Map

